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September 5, 2018

**VIA ECF**

Hon. Brian M. Cogan  
United States District Court Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Letter Motion To Adjourn Response Date And To Set A Briefing Schedule  
*Miller, et al. v. Arab Bank, PLC*, No. 1:18-CV-02192 (BMC) (PK) (E.D.N.Y.)  
*Pam, et al. v. Arab Bank, PLC*, No. 1:18-CV-04670 (BMC) (PK) (E.D.N.Y.)**

Dear Judge Cogan:

We represent Defendant Arab Bank plc in the above-referenced actions and write in light of today's reassignment of the above-referenced *Pam* action to Your Honor as a "related case" to *Miller*. Pursuant to Your Honor's Order of July 25, 2018, the Bank was scheduled to respond to the *Miller* First Amended Complaint ("FAC") by September 7, 2018. However, in light of the reassignment of *Pam*, which was filed on August 17, 2018, we respectfully request that the Court adjourn the Bank's current response deadlines, and enter an order requiring the parties to submit one set of consolidated briefing papers on the Bank's motion to dismiss both *Miller* and *Pam*. Granting this relief is in the interest of judicial efficiency. Plaintiffs have been consulted and consent to this request.

The parties respectfully request that the Court set the following schedule for the briefing of the Bank's consolidated motion to dismiss both *Miller* and *Pam*: (i) the Bank's moving papers shall be filed and served on or before October 5, 2018; (ii) the Plaintiffs' opposition papers shall be filed and served on or before November 5, 2018; and (iii) the Bank's reply papers, if any, shall be filed and served on or before November 19, 2018.

We thank the Court for its consideration of this request.



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Respectfully submitted,

**DLA Piper LLP (US)**

/s/ *Jonathan Siegfried*  
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cc: All Counsel Of Record (by ECF)